

# **EXHIBIT “A”**

**Madden, Eric**

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**From:** Madden, Eric  
**Sent:** Sunday, July 08, 2007 11:46 PM  
**To:** mqc@callister-reynolds.com; rwalker@woodburykesler.com  
**Cc:** Berman, Geoff; Diamond, Allan; Reid, Bill; Charles, Robert; sfreeman@lrlaw.com; malevinson@orrick.com; geg@gordonsilver.com; ritkin@steptoe.com; fburke@steptoe.com; ddwilliamson@coxsmith.com  
**Subject:** USACM -- Amended Stipulated Protective Order  
**Attachments:** Amended stipulated protective order.DOC; stipulated protective order.pdf



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Counsel:

As you know, your clients and various other parties entered into a Stipulated Protective Order in January 2007. Unfortunately, some of the procedures set forth in the Stipulated Protective Order proved to be unworkable for various reasons. The result is that no party to the Stipulated Protective Order -- not your clients, my client, or anyone else -- has had access to the documents subject to that order.

Accordingly, the USACM Trust, Diversified, the USAIP Trustee and the trustees in your individual cases propose to amend certain provisions of the order in order to make the process workable. As you will see, the revised procedure permits your clients to assert their alleged attorney-client privileges with respect to the documents.

Attached are the following documents for your review and comments: (1) the original Stipulated Protective Order; and (2) the draft Amended Stipulated Protective Order. Please let us know of any suggested changes or comments regarding the Amended Stipulated Protective Order on or before Thursday, July 12, 2007. We hope to file a motion to approve this order on Friday, July 13th and to have it heard on July 27th or August 7th.

Regards,  
Eric Madden

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